

Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of )  
 ) WC Docket No. 08-152  
Petition of AT&T Inc. for Interim )  
Declaratory Ruling and Limited Waivers )  
Regarding Access Charges and the )  
“ESP Exemption” )  
 )  
 )

**REPLY COMMENTS OF THE NEBRASKA PUBLIC SERVICE COMMISSION**

**INTRODUCTION**

The Nebraska Public Service Commission (“NPSC”) hereby submits the following reply comments in response to the Federal Communication Commission’s (“Commission’s”) Public Notice<sup>1</sup> on the Petition by AT&T Inc. for an Interim Declaratory Ruling and Limited Waivers Regarding Access Charges and the- “ESP Exemption.” The NPSC writes these comments simply to advocate that the FCC take a comprehensive approach to intercarrier compensation reform rather than addressing the issues on an interim basis. Accordingly, the NPSC would recommend a denial of any Petitions seeking Interim Declaratory Ruling and the associated limited waiver requests.

**DISCUSSION**

The NPSC considered the comments filed in this proceeding and its advocacy position is aligned very closely with the comments filed by the Washington Utilities and Transportation Commission (WUTC).<sup>2</sup> The Commission should focus its attention on the comprehensive reform rather than spend time looking at interim steps and carrier-specific waivers. The NPSC agrees with the WUTC that the time and effort devoted to

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<sup>1</sup> FCC Public Notice, DA 08-1725, July 24, 2008.

<sup>2</sup> See Comments of the Washington Utilities and Transportation Commission filed August 21, 2008.

considering AT&T's petition could delay proceedings already well underway. Regardless, of the substantive merits of the AT&T Petition, which the NPSC is not commenting on here, the Commission should not waste time adopting piecemeal waivers and interim steps when it has the tools and record to revamp the compensation mechanism in its entirety.

A number of commenters requested the Commission continue to consider the comprehensive proposals on the table such as the Missoula Plan. The NPSC agrees and hopes that the Commission will continue its consideration of the records developed in CC Docket No. 01-92 and WC Docket No. 99-68 relative to intercarrier compensation reform; and CC Docket No. 96-45 and WC Docket No. 05-337 relative to universal service reform.

Accordingly, the NPSC recommends denial of the AT&T Petition and requests the Commission to continue consideration of comprehensive reform proposals.

Dated: September 2, 2008.

Respectfully Submitted,

The Nebraska Public Service Commission

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